

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY
R.J. Hughes Justice Complex
25 Market Street, P.O. Box 080
Trenton, New Jersey 08625
Attorney for Defendant-Intervenor

By: Michael L. Zuckerman
Deputy Solicitor General
(862) 350-5800
Michael.Zuckerman@njoag.gov

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

THE MENDHAM METHODIST CHURCH;
and THE ZION LUTHERAN CHURCH
LONG VALLEY,

Plaintiffs,

v.

MORRIS COUNTY, NEW JERSEY; MORRIS
COUNTY BOARD OF COUNTY
COMMISSIONERS; MORRIS COUNTY
HISTORIC PRESERVATION TRUST FUND
REVIEW BOARD; and JOHN KRICKUS, in
his official capacity as Commissioner Director
for the Morris County Board of County
Commissioners,

Defendants,

ATTORNEY GENERAL OF NEW JERSEY,

Intervenor-Defendant.

Hon. Evelyn Padin, U.S.D.J.
Hon. Jessica S. Allen, U.S.M.J.

Docket No. 2:23-cv-2347-EP-JSA

CIVIL ACTION

(ELECTRONICALLY FILED)

Motion Return Date: May 6, 2024

**NOTICE OF MOTION TO ABSTAIN
AND HOLD THE CASE IN ABYEANCE
PURSUANT TO *PULLMAN*
ABSTENTION DOCTRINE**

TO: Hon. Evelyn Padin, U.S.D.J.
Counsel of Record
(via CM/ECF)

PLEASE TAKE NOTICE that on May 6, 2024, the undersigned, Matthew J. Platkin, Attorney General of New Jersey, by Deputy Solicitor General Michael L. Zuckerman, appearing on behalf of Defendant-Intervenor, Attorney General of New Jersey, shall move before the Honorable Evelyn Padin United States District Judge, in the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102, for an Order to hold this case in abeyance pursuant to the *Pullman* abstention doctrine.

PLEASE TAKE FURTHER NOTICE that the undersigned will rely on the attached Brief in support of the motion.

A proposed form of Order is attached hereto.

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Michael L. Zuckerman
Michael L. Zuckerman (NJ No. 427282022)
Deputy Solicitor General
Michael.Zuckerman@njoag.gov

Dated: April 10, 2024